

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

CHRISTIE ANDREWS,)	
)	
Plaintiff,)	CASE NO. 3:21-cv-00526
)	
v.)	Judge Eli J. Richardson
)	Magistrate Judge Jefferey S. Frensley
TRI STAR SPORTS AND ENTERTAINMENT GROUP, INC.,)	
)	
Defendant.)	JURY DEMAND

DECLARATION OF LOUISE TAYLOR

State of Tennessee)

County of Davidson)


1. My name is Louise Taylor. I am a resident of Williamson County, Tennessee, am over the age of 18 and am competent to testify to the matters stated herein. I have personal knowledge of the facts contained in this declaration.
2. I am the owner and CEO of Tri Star Sports and Entertainment Group, Inc. ("Tri Star"), the defendant in this case. I am familiar with team coordinator job duties and requirements.
3. Regular in-person attendance is an essential function of the team coordinator position.
4. The position requires regular in-person interaction and collaboration with other team members.
5. A team coordinator's schedule varies from day to day and can be unpredictable.
6. Team coordinators are often required to attend impromptu meetings on site.
7. The tasks a team coordinator is required to perform also vary from day to day and can be unpredictable.

8. The position requires immediate access to documents and information, some highly confidential (like financial and personal identifying information), that is housed on-site at Tri Star. It also requires immediate access to other Tri Star employees.
9. Equipping any Tri Star employee to permanently work from home would require secure mobile office equipment.
10. A true and correct copy of the team coordinator job description is attached as Exhibit 1.
11. At the beginning of March 2020, Tri Star had 132 employees.
12. On March 20, 2020, ten employees, including Christie Andrews, were laid off because of the pandemic. Four more were laid off later that month.
13. Between March and June 2020, a total of 33 employees were laid off as part of a reduction in force made necessary by the Covid-19 pandemic.

I declare under penalty of perjury that the foregoing information is true and correct to the best of my knowledge, information and belief.

FURTHER THE DECLARANT SAITH NOT.

Dated this 2 day of November 2022.



Louise Taylor

EXHIBIT 1

POSITION PROFILE

DEPARTMENT: Business Management

TITLE: Team Coordinator

Tri Star Sports and Entertainment Group is a business management firm that serves professional athletes and entertainers. Our internal culture is one that communicates optimal performance, honesty, integrity, teamwork and commitment to all clients served. Our employees must be like-minded professionals with a heart and dedication to super serving clients and their trusted advisors. As a business management firm, our core competencies include bill pay, the preparation of financial statements and tax returns, tour accounting, royalty reviews and audits. We are the personal Chief Financial Officers for athletes and entertainers serving their personal and professional accounting needs. It is our duty to chart the greatest course of action for our clients which includes preservation, growth and execution of their financial plans. This allows us to bring peace and financial predictability to our clients, facilitating their ability to reach their fullest professional and personal goals.

SPECIFIC RESPONSIBILITIES & DELIVERABLES FOR THIS POSITION INCLUDE:

- Responsible for execution of client ancillary support tasks and projects as directed by Business Management team.
- Scanning, filing and other basic administration to support staff and managers.
- Point person to assist with client real estate purchases and sales.
- Point person to assist with all car / equipment acquisitions and sales.
- Assisting with client needs relating to property, vehicles and identification documents.
- Executing ad-hoc administrative assignments.
- Prioritizing matters and tasks, effectively communicating updates to appropriate parties and soliciting assistance where needed.
- Ensuring actions contribute to the maintenance of client relations.
- Coordinating and maintaining accurate records for client possessions and information, such as client keys, credit cards, etc.
- Maintaining accurate records of client passwords/alarm codes.
- Assisting with ad-hoc administrative duties and projects as assigned.

This position requires a highly organized individual who possesses strong initiative and has the ability to complete multiple projects in a deadline driven environment. This individual must be able to communicate effectively and understands the need to work in an integrated manner with other members of the department in furtherance of goals, objectives, and knowledge.

TRI STAR CORE VALUES & EMPLOYEE COMPLIANCE

PERFORMANCE	<i>Employee provides clients with excellent reporting and service</i>	HONESTY & INTEGRITY	<i>Employee is transparent and accountable, always being truthful to staff and clients</i>	TEAMWORK	<i>Employee actively participates in group discussions, tasks, and projects</i>	COMMITMENT	<i>Employee is dedicated to their role within Tri Star, the core values of the firm, and its clients</i>	TECHNOLOGY	<i>Employee seeks to capitalize on innovative technologies and contribute to positive change for the firm</i>
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SKILLS & EXPERIENCE REQUIREMENTS

- ☒ 4+ years working in office/ client service administration or management.
- ☒ Bachelor's Degree in Communication, Business Management, or relevant area of study with strong academic record.
- ☒ Strong project management and organizational skills.
- ☒ Superior verbal and written communication skills.